

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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REPUBLIC OF HAITI,

1:24-CV-00157 (JLR)(GS)

Plaintiff(s),

-against-

HARRIS SLIWOSKI LLP,  
DAN HARRIS, AND JOHN MCDONALD,

Defendants.

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**NOTICE OF MOTION TO DISMISS**

PLEASE TAKE NOTICE that, upon this Notice, the accompanying Memorandum of Law and Request to Take Judicial Notice of Christopher T. Scanlon in Support of Defendants' Motion to Dismiss and the pleadings and proceedings in this action, Defendants will and hereby do move before the Honorable Jennifer Rochon, United States District Judge for the Southern District of New York, on a date and at a time convenient to the Court, at the United States Courthouse, 500 Pearl Street, Courtroom 20B, New York, NY 10007, for an order pursuant to Fed. R. Civ. P. 12(c) granting defendants judgment on the pleadings, dismissing this case in its entirety for failure to state a claim on which relief can be granted, and for such other and further relief in favor of the moving defendants as this court deems just and proper.

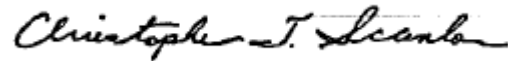
Pursuant to Rule 3(A) (Pre-Motion Conferences in Civil Cases) of the Individual Rules of Practice in Civil Cases of Your Honor, no pre-motion letters or pre-motion conferences are required in regard to this motion..

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1(b), any

opposing affidavits and answering memoranda shall be served within fourteen (14) days after service of these moving papers.

Dated: New York, New York  
May 14, 2024

Respectfully submitted,



By:

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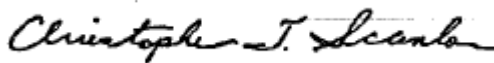
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File No.: 23-1843-00-1

**CERTIFICATE OF SERVICE**

I certify that on the 14<sup>th</sup> day of May, 2024, I caused a true and correct copy of the foregoing Motion to Dismiss to be served via ECF Filing on all counsel of record:

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Christopher T. Scanlon